

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION, et  
al.,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC

and

CORTEVA, INC.,

Defendants.

CASE NO. 1:22-CV-828-TDS-JEP

**DEFENDANTS' MOTION FOR LEAVE TO FILE DOCUMENT IN  
SUPPORT OF MOTIONS TO DISMISS THE AMENDED COMPLAINT**

Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC (collectively, “Syngenta”) and Corteva, Inc. (“Corteva”) (collectively, “Defendants”), respectfully move for leave to file the attached amicus brief filed by Plaintiffs Indiana, Iowa and Nebraska on June 12, 2023, in the U.S. Court of Appeals for the Fifth Circuit, arguing that Plaintiff Federal Trade Commission’s structure violates Article II of the U.S. Constitution. Plaintiffs Indiana, Iowa and Nebraska present the same constitutional challenges that Defendants present in their Motions to Dismiss the Amended Complaint in this Action. (Doc. 95 at 23-27; Doc. 99 at 3; Doc. 125 at 12-15.)

Respectfully submitted this 20th day of June, 2023.

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83.1(d)

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